

COOLEY LLP
 BOBBY GHAJAR (198719)
 JOHN HEMANN (165823)
 JUDD LAUTER (290945)
 RYAN C. STEVENS (306409)
 3 Embarcadero, 20th Floor
 San Francisco, California 94111-4004
 Telephone: (415) 693-2000
 Facsimile: (415) 693-2222
 Email: bghajar@cooley.com
 jhemann@cooley.com
 jlauter@cooley.com
 rstevens@cooley.com
 DAVID CHIU (189542)
 City Attorney
 JESSE SMITH (122517)
 Chief Assistant City Attorney
 YVONNE R. MERÉ (173594)
 Chief Deputy City Attorney
 JULIE VEIT (209207)
 CHRISTOPHER STUART (262399)
 Deputy City Attorneys
 City Hall
 1 Dr. Carlton B. Goodlett Place
 San Francisco, California 94102-4682
 Telephone: (415) 554-4700
 Facsimile: (415) 554-4757
 Email: Cityattorney@sfcityatty.org
 Jesse.Smith@sfcityatty.org
 Yvonne.Mere@sfcityatty.org
 Julie.Veit@sfcityatty.org
 Christopher.Stuart@sfcityatty.org

Attorneys for Plaintiff
 CITY AND COUNTY OF SAN FRANCISCO

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CITY AND COUNTY OF SAN FRANCISCO,

 Plaintiff,

 v.

 CITY OF OAKLAND AND PORT OF
 OAKLAND,

 Defendants.

AND RELATED COUNTERCLAIM

Case No. 3:24-CV-02311-TSH

**DECLARATION OF RYAN C. STEVENS IN
 SUPPORT OF PLAINTIFF'S CITY AND
 COUNTY OF SAN FRANCISCO'S
 ADMINISTRATIVE MOTION TO CONTINUE
 HEARING ON DEFENDANT CITY OF
 OAKLAND'S MOTION FOR SUMMARY
 JUDGMENT**

1 I, Ryan C. Stevens, hereby declare as follows:

2 1. I am a member in good standing of the State Bar of California and am admitted to
3 practice before this Court. I am an associate at the law firm of Cooley LLP, counsel for the City
4 and County of San Francisco (“San Francisco”) in the above-captioned action. Pursuant to Civil
5 Local Rules 6-3 and 7-11, I make this Declaration in support of San Francisco’s Administrative
6 Motion to Continue Hearing on Defendant City of Oakland’s Motion for Summary Judgment. I
7 have personal knowledge of the facts contained herein and if called as a witness would and could
8 testify competently thereto.

9 2. On November 8, 2020⁴ I met and conferred with counsel for the City of Oakland by
10 phone and requested a stipulation to briefly continue the motion for summary judgment so that the
11 parties could ascertain whether an order on the motion for preliminary injunction would either moot
12 the issue or open a path to resolution that would not require motion practice. I also explained San
13 Francisco’s position that it was too early in the case to file for summary judgment because the
14 parties had not engaged in discovery. In the alternative I requested a brief continuance as a courtesy.
15 The City of Oakland refused to agree a continuance.

16 3. On November 10, 2024, I wrote to counsel for the City of Oakland, asking that
17 counsel reconsider their refusal to enter a continuance and again requested a continuance. Given
18 the timing of San Francisco’s deadline to oppose, San Francisco explained that they would file this
19 administrative motion if they did not hear a response from the City of Oakland by November 11,
20 2024 at 12:00 PST. A true and correct copy of my email exchange with counsel for the City of
21 Oakland is attached as **Exhibit A**. As of the time of this filing, the City of Oakland has not
22 responded to this communication.

23 4. San Francisco’s opposition to the City of Oakland’s motion for summary judgment
24 is due on November 13, 2024, and the hearing is noticed for December 5, 2024.

25 5. The parties have not yet had an initial case management conference, engaged in a
26 Rule 26(f) conference, or exchanged initial disclosures.

27
28

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on
2 November 11, 2024, in San Francisco, California.

3
4 /s/Ryan Stevens

Ryan Stevens